

JUDGE SHADUR

MAGISTRATE JUDGE COLE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CASEY NODEL,)
)
 Plaintiff,)
) No. 08 CV ____
 -vs-)
) (*jury demand*)
 TIMOTHY GRISBY, #19741,)
)
 Defendant.)

COMPLAINT

Plaintiff, by counsel, allege as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this Court is conferred by 28 U.S.C. §1343 and 28 U.S.C. §1367.
2. Plaintiff Casey Nodel is a resident of the State of Michigan.
3. Defendant Timothy Grisby, #19741, was at all times relevant acting as a Chicago police officer.
4. On September 28, 2007, defendant arrested plaintiff and caused her to be charged with offenses.
5. Defendant did not have a lawful basis to arrest plaintiff.
6. After arresting plaintiff without probable cause, defendant made up facts to justify his unlawful act.
7. Plaintiff was prosecuted on the basis of the falsehoods fabricated by defendant 19741.

8. At her first court appearance, plaintiff demonstrated to the prosecutor that the officer had made up a story to explain the arrest and the prosecutor dismissed all charges.
9. As the direct and proximate result of the above described acts, plaintiff was subjected to a false arrest, maliciously prosecuted, and deprived of rights secured by the Fourth Amendment to the Constitution of the United States.
10. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that judgment be entered in her favor in an amount in excess of fifty thousand dollars as compensatory and punitive damages.

/s/ Kenneth N. Flaxman

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